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Pg 1 of 5 Hearing Date: September 24, 2013 at 10:00 a.m. (ET) (4 pigs)

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re:)	Case No. 12-12020 (MG)
RESIDENTIAL CAPITAL, LLC, et al.,)	Chapter 11
Debtors.)	Jointly Administered
)	

DEBTORS' OMNIBUS REPLY IN SUPPORT OF DEBTORS' TWENTY-SIXTH AND TWENTY-SEVENTH OMNIBUS CLAIMS ORJECTIONS TO BORROWER CLAIMS WITH INSUFFICIENT DOCUMENTATION

Pls. See Attorched - Claimants letter

CLAIMANT & PROOF OF CLAIM NO.	RESPONSE	DOCKET NO.	COMMENTS
Twenty-Seventh Omnibus Claims Objection	ims Objection		
			The Claimants have filed three proofs of claims against the Debtors, each relating to a mortgage note for a separate property. The stated basis of each proof of claim is "mortgage note." Each proof of claim attaches a copy of the Claimants' GMACM account statement and a copy of the relevant mortgage note.
Zenaida R. Valencia and Ronaldo H. Valencia (Claim Nos. 2869, 2872 and 2874)	Response of Zenaida R. Valencia and Rolando H. Valencia to Debtors' Twenty-Seventh Omnibus Objection to Claims (Borrower Claims with Insufficient Documentation)	4918	The Response characterizes the basis of each proof of claim as "GMAC Mortgage originated and serviced the loan," and attaches additional loan-related documentation. However, the Response, as it relates to Claim Nos. 2869 and 2872, does not explain why the Debtors owe the Claimants money. With respect to Claim No. 2874, the Claimants assert that their current 5.125% interest rate on the mortgage at issue is greater than the 5.0% interest rate stated in the mortgage note. In fact, however, the mortgage note attached by the Claimants in connection with Claim No. 2874 states an interest rate of 5.125%.

September 23, 2013

UNITED STATES BANKRUPTCY COURT FOR SOUTHERN DISTRICT OF NEW YORK THE CHAMBERS OF THE HONORABLE MARTIN GLENN ONE BOWLING GREEN/
NEW YORK, NEW YORK 10004
COURTROOM 501

Reference: RESIDENTIAL CAPITAL LLC, et al (CASE #12-12020 (MG))

DEBTORS' OMNIBUS REPLY IN SUPPOR OF DEBTOR'S TWENTY-SIXTH AND

TWENTY-SEVENTH OMNIBUS CLAIMS OBJECTIONS TO BORROWER CLAIMS

WITH INSUFFICIENT DOCUMENTATION FILED 9/20/2013

Docket No. 4918

(CLAIMANTS RECEIVED COPY OF DOCUMENT 9/23/2013 VIA FEDERAL EXPRESS)

cc: MORRISON & FOERTSTER LLP
KRAMER LEVIN NAFTALIS & FRANKEL LLP

Claimant: ZENAIDA R. VALENCIA AND ROLANDO H. VALENCIA Claim # 2869 - (Secured) \$127,257.19- Mortgage Note Claim #2872 - (Secured) \$178,160.67 - Mortgage Note Claim #2874 - (Secured) \$260,308.94 - Mortgage Note

To Whom It May Concern:

We are **still opposing** the expungement, and/or disallowance of our claims. We disagree with the objection. Claims #2869 and 2872 are mortgage loans originated and serviced by GMAC Mortgage since December 20, 2002 until May 14, 2012 when Res Cap, LLC filed Bankruptcy Chapter 11 until the loans were transferred to Green Tree Servicing (the current servicer). Claim #2874 is another mortgage loan that GMAC originated and serviced the loan on April 25, 2003 until May 14, 2012 when Res Cap LLC filed Bankruptcy Chapter 11 until loan was transferred to Green Tree Serving (the current servicer).

We responded within the 30 days notification from Res Cap LLC regarding the additional documents that we failed to include when the Proof of Claims were filed. The Evidence of Perfection of our claims which is the Mortgage (Deed of Trusts) were sant to Res Cap, LLC Claims Management, Bloomingfield, Minnesota. Res Cap, LLC advised that, if the additional documents were not received in their office by June 20, 2013, our claims will be objected and expunded. The additional copies of documents that we sent were received in their office on June 19, 2013 at 8:58 a.m. A print out of the e-mall we received from Claims. Management@gmac.reseap.com was included with the copies of documents we provided to your office when we filed the objection of our claims. Copies of the documents were also sent to Morrison & Foerster LLP and Kramer and Levin Naftalis & Frankei LLP via express mail.

We just received via Federal Express from Kurtzman Carson Consultants KCC/El Segundo, CA copy of the DEBTORS' OMNIBUS REPLY IN SUPPORT OF DEBTORS' TWENTY-SIXTH AND TWENTY-SEVENTH OMNIBUS CLAIMS OBJECTIONS TO BORROWER CLAIMS WITH INSUFFICIENT POCUMENTATION filed 9/20/13 that the Debtors are submitting to the court that the relief sought in the Objection should be granted. Per MORRISON & FOERSTER LLP we failed to respond and provide the additional documents to Res Cap LLC within the time frame that they gave us. This is incorrect.

In regards to our claim # 2874, we are <u>not asserting</u> the interest rate of the Mortgage Note. We double checked the Note rate. The rate is correct. We applicate for this error on our part.

We are requesting the court to please re-review our claims. If you have any questions, please contact us at (619) 710-0697.

Sincerely,

Zenaida R. Valencia